

February 6, 2002

The Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on Akzo Nobel's HPV Test Plan for Butylated Triphenyl Phosphate

Dear Administrator Whitman:

The following comments on Akzo Nobel's test plan for the individual chemical butylated triphenyl phosphate are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than nine million Americans.

Akzo Nobel has presented data for each HPV SIDS endpoint and has appropriately not proposed any additional testing. However, the test plan and summaries for butylated triphenyl phosphate reflect thoughtless, check-the-box toxicology. The summaries consist merely of a printout from the IUCLID database. Akzo Nobel provides no text or explanation of the chemical's applications, or fundamental physical, chemical, and toxicological properties.

Importantly, this compound could easily be included in a chemical category. Butylated triphenyl ether is one of many phenyl-phosphorus compounds that are included in the HPV Program, and would logically fall into the same group in the development of a test plan. This group provides an ideal opportunity to apply structure-activity relationships to evaluate the toxicity of the compounds. A table of other phenyl phosphorus HPV compounds is presented in our comments on the Phosphite Producers HPV Consortium's test plan for tris(nonylphenyl)phosphite, which can be viewed at <http://www.epa.gov/chemrtk/phsphite/trispcrmct.pdf>

We support the conclusion that no animal testing is warranted, but contend Akzo Nobel should provide a more thoughtful analysis of this chemical and its fundamental uses and properties. Once again, we maintain that it is critical that EPA play a leadership role in encouraging the development of chemical categories as to maximize available information and avoid unnecessary, expensive, and poorly conceived testing.

Thank you for the opportunity to comment. I can be reached at 202-686-2210, ext. 302, or via e-mail at ncardello@pcrm.org. Correspondence should be sent to my attention to PCRM, 5100 Wisconsin Ave., N.W., Suite 4000, Washington, DC 20016.

Sincerely,

Nicole Cardello, M.H.S.
Staff Scientist